IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MEMPHIS A. PHILLIP RANDOLPH)
INSTITUTE, THE EQUITY ALLIANCE,)
FREE HEARTS, THE MEMPHIS AND	
WEST TENNESSEE AFL-CIO)
CENTRAL LABOR COUNCIL, THE	
TENNESSEE STATE CONFERENCE)
OF THE NAACP, SEKOU) Case No. 3:20-cv-00374
FRANKLIN, and KENDRA LEE,) Judge Richardson
) Magistrate Judge Frensley
Plaintiffs,)
)
v.)
)
TRE HARGETT, in his official capacity)
as Secretary of State of the State of)
Tennessee, MARK GOINS, in his)
Official capacity as Coordinator of)
Elections for the State of Tennessee,)
and AMY WEIRICH, in her official)
capacity as the District Attorney General)
for Shelby County, Tennessee,)
)
Defendants.)

DEFENDANTS' MOTION TO DISMISS

Pursuant to Rule 12(b)(1) and (6), Fed. R. Civ. P., Defendants move the Court to dismiss this case in its entirety for lack of standing and for failure to state a claim. A Memorandum of Law in support of this Motion is filed herewith.

Respectfully submitted,

HERBERT H. SLATERY III Attorney General and Reporter

/s/ Andrew B. Campbell
JANET M. KLEINFELTER (BPR #13889)
Deputy Attorney General
Janet.kleinfelter@ag.tn.gov

ANDREW B. CAMPBELL (BPR #14258) Senior Assistant Attorney General Andrew.campbell@ag.tn.gov

ALEXANDER S. RIEGER (BPR 029362) Assistant Attorney General Alex.rieger@ag.tn.gov

MATTHEW D. CLOUTIER (BPR 036710) Assistant Attorney General Matt.cloutier@ag.tn.gov

Office of the Tennessee Attorney General Public Interest Division P.O. Box 20207 Nashville, TN 37202 (615) 741-7403

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing documents have been forwarded electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

William L. Harbison Lisa K. Helton Christopher C. Sabis Christina R.B. López Sherrard, Roe, Voigt & Harbison, PLC 150 3rd Avenue South, Suite 1100 Nashville, TN 37201

Ezra Rosenberg Pooja Chaudhuri Jacob Conarck Lawyers' Committee for Civil Rights Under Law 1500 K Street NW, Suite 900 Washington, DC 20005 Danielle Lang Ravi Doshi Molly Danahy Jonathan Diaz Campaign Legal Center 1101 14th Street NW, Suite 400 Washington, DC 20005

Date: August 10, 2020 /s/ Andrew B. Campbell

Andrew B. Campbell Senior Assistant Attorney General